

LIST OF EXHIBITS AND WITNESSES

Case Num	iber	ED23-515-	HDV-JPRx	т	Title ED	OGAR S	SOLIS VS. STATE OF CALIFORNIA; AND MICHA	AEL BELL
Judge		Hernán D. V	Vera, U.S. D	istrict Judg	ge			<u>-</u>
Dates of T or Hear	- 1	02/18/25; 0	2/19/25; 02/	20/25; 02/2	24/25; 02/25	5/25; 02	2/26/25; 02/27/25; 02/28/25 FILED CLERK, U.S. DISTRICT C	COURT
Court Rep		Maria Bust	illos				02/28/2	
Deputy Cl	lerks	Wendy Her	nandez		<u> </u>		BY: WH I	DEPUTY
	Atto	orney(s) for P	'laintiff(s) / P	etitioner(s)		T	Attorney(s) for Defendant(s) / Respondent	(s)
Dale Gali	ро					ī	DAG David Klehm	
Marcel Si	ncich]	DAG Tammy Kim	
Trenton P	acker							
Plainti	ff(s) or P	etitioner(s)		Defendant(s) Respondent(
Ex. No.	Id.	Ev.	Ex. No.	Id.	Ev	1	EXHIBIT DESCRIPTION / WITNESS	Called By
12	02/18/2	2.5	1	 		Portio	ons of deposition of Deft Bell read into the record	Plaintiff
90-2	02/18/2	15	1	1		State	ment discussed with Deft Bell	
						Portio	ons of Deposition of Witness Marlene Sue Biggs	Defendants
				Ì		into t	he record- pages 6-8	
						six-se	econd camera video of deputy played by plaintiff	Plaintiff
						on 02	1/19/25 - no exhibit # provided	
	<u> </u>				ļ	Plain	tiff's deposition read into the record	Pltf & Defts
	<u> </u>					pages	45,191, 193	
			ļ	ļ		<u> </u>		
			220	02/25/25	02/25/25	1 pag	e physical photograph of video exh 120	Deft
			↓					
			 	ļ	ļ			
			┼	ļ		 		
			 					
		-	 			<u> </u>		
	<u> </u>		 -			 		_
			 	<u> </u>		├		
		1	1		1			

G-65 (03/07)

Filed 01/27/25

Page 2 of 8 Page ID Filed 01/27/25 Document 99 #:1534 Case 5:23-cv-00515-HDV-JPR

TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF RECORD:

Plaintiff Edgar Solis hereby serves the following list of witnesses which he may call during trial, as Plaintiff's

Second Amended Witness List. Plaintiff reserves the right to supplement and/or amend this list.

Below reflects approximate times for examination.

3

4

5

Respectfully Submitted,

9

DATED: January 27, 2025

LAW OFFICES OF DALE K. GALIPO LAW OFFICES OF GRECH & PACKER

By: // Sincich Dale K. Galipo Marcel F. Sincich Marcel F. Sincich Trent C. Packer Attorney for Plaintiff

10

16

14

15

19

20

21

18

2

Case No.: 5:23-cv-00515-HDV-JPR

PLAINTIFF'S SECOND AMENDED WITNESS LIST

9

9

10

16

17

14

15

18

19

20

21

Page 3 of 8 Page ID

Case 5:23-cv-00515-HDV-JPR Document 99 Filed 01/27/25 #:1535

	Plaintiff's Witness List			
Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Edgar Solis Plaintiff	Mr. Solis will testify as to his perception of the events leading up to the shooting incident, the shooting incident, and his damages. His testify is unique as a personal account that he was not an immediate threat to any person.	45 min – 1 hr.	2 hours	2/29/25
Michael Bell Defendant, Officer, California Highway Patrol	Officer Bell is likely to testify as to his perception of the incident, information known, tactics used, the deadly force used against plaintiff, and plaintiff's damages, including punitive damages. Officer Bell's testimony is unique as the defendant who used force against plaintiff.	1 hr. 15 min – 1 hr. 30 min	1 hr. 30 min.	2/10/125
Patrick Sobaszek Detective, City of Hemet Police Department	Detective Sobaszek is likely to testify as to his perception of the incident, tactics used before and after the use of deadly force, and plaintiff's damages. Detective Sobaszek's testimony is unique as an eyewitness to defendant's second volley of shots, and who took the same path as defendant and plaintiff prior to the shots.	45 min	45 min.	
Arthur Paez Sergeant, City of Hemet Police Department	Sergeant Paez is likely to testify as to his perception of the incident, the tactics before and after the use of deadly force, and plaintiff's damages. Sgt. Paez's testimony is unique as the leader of the team, who sent the information about plaintiff to the team, and who witnessed the shooting of plaintiff by Deputy Waltermire.	30 – 45 min	45 min.	
Salvador Waltermire	Deputy Waltermire is likely to testify as to his perception of the incident, the tactics used before and	45 min	30 min	

PLAINTIFF'S SECOND AMENDED WITNESS LIST

7.7		0001:		
ŧ	‡			

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Deputy, County of Riverside Sheriff's Department	after the use of deadly force, and plaintiff's damages. Deputy Waltermire's testimony is unique as an officer who used force against plaintiff prior to his flight and used deadly force against plaintiff after Defendant used deadly force against plaintiff.			
Gary Adams GLA Investigations, Plaintiff's Expert	Mr. Adams is plaintiff's investigation expert who will testify as to his scene assessment and photographs taken; observations on scene; what can and cannot be seen as demonstrated with assistant and dummy gun.	30 – 40 min	45 min	2/20/25
Roger Clark Police Procedures Consultant, Inc., Plaintiff's Expert	Roger Clark is Plaintiff's single police practices expert who will testify as to his opinions rendered in this case based on his knowledge and experience in law enforcement and his review of materials in this case. Mr. Clark's testimony is unique as plaintiff's only witness to explain basic law enforcement training and the POST standards as it relates to this case, including vehicle and patrol operations, de-escalation, tactics, and the use of force and deadly force. Mr. Clark will opine on the use of deadly force standards, and the appropriateness of the use of deadly force under the circumstances of this case; hypothetical questions based on the evidence of the case; and his understanding of the forensic and physical evidence presented in this case.	l hr.	1 hr. 30 min	2/20/25; 2/24/25
Dr. Ryan O'Connor Emergency Medical Physician, Plaintiff's Expert	Dr. O'Connor is plaintiff's sole medical expert in this case who will testify as to plaintiff's injuries, treatment, damages, pain and suffering, summary of nearly nine thousand pages of medical records, and care likely to be required in the future.	45 min – 1 hr.	45 min	selhele

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Brett Fisher AMR crew member and paramedic	Mr. Fisher was the primary care crew member on the ambulance that treated Mr. Solis on scene and provided care during emergency transport to the hospital, and has information related to Mr. Solis' injuries, complaints, vital signs, symptoms, treatment and cost.	30 min	45 min	284/28
Balaji, Anupama, P&S non-retained expert provider	Dr. Balaji will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Agapian, John, MD non-retained expert provider	Dr. Agapian will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Downing, Stephanie, MD non-retained expert provider	Dr. Downing will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	7/24/25

Jaden SchligMr. Schlig will tEyewitnessas an eyewitnessHillmer Dr.Marlene Sue BiggsMs. Biggs will teEvewitnessan eyewitness to				Testimony
Marlene Sue Biggs Evewitness	מיני ווכותכוון ווכווו מככ	20 min	20 min	2/19/25
Hillmer Dr.		20 min	20 min	2/10/25
Richard Contla Mr. Contla will to as an eyewitness Eyewitness Taschner Dr.	estify as to his observations on scene to portions of the incident from 622	20 min	30 min	
01				ā
*Olin, Nicholas, MD non-retained expert provider Room physician, evaluation, signs procedures including diagnosis, progner for Plaintiff regar		30 min	30 min	
*Park, Heesung, MD Dr. Olin will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	*	30 min	30 min	
*Powers, Bret, DO non-retained expert provider Room physician,	estify includes knowledge of and Plaintiff as attending Emergency including but not limited to the	30 min	30 min	

eval proc diag for I		(Hours)	(GIROTT)	Testimony
	evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.			
*Stout, Benton, PA non-retained expert provider inter inclusions symparts in the sympart provider inclusions in the plan guns guns	Dr. Stout will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Jennifer Jernegan Lead Sher diag	Lead Forensic Evidence Supervisor, Riverside County Sheriff's Department. Involved prepared a scaled 3D diagram and incident investigation and collection of evidence.	20 min	20 min	
*Ashley Cary Fore Depg Photo photo and 6	Forensic Technician II, Riverside County Sheriff's Department. Involved in charting of officers; photographs of Solis at hospital; scene investigation, and evidence photographs.	20 min	20 min	
*Vanderfeer Fore	Forensic Technician II, Riverside County Sheriff's Department. Photographed scene on Taschner.	20 min	20 min	
*Yesika Alvarado Fore Sher Med photo Scan	Forensic Evidence Technician, Riverside County Sheriff's Department. Went to scene with Investigators Medoza and Cline; photographed 604 Hillmer; photographed cul-de-sac; completed Faro Laser Scanner scans of scene; collected evidence assisted by Torres; prepared a scaled 3D diagram.	20 min	20 min	

Page 8 of 8 Page ID)
Filed 01/27/25	
Document 99	#:15/JO
Case 5:23-cv-00515-HDV-JPR	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
*Monique Torres	Forensic Technician II; went to scene with Investigators Medoza and Cline to collect and chart evidence; prepared a scaled 3D diagram	20 min	20 min	
*Sienna Knoll	Forensic Technician II; photographed and processed the Mustang	20 min	20 min	
*Daniel Cline	Deputy, Riverside County Sheriff's Department. Involved in evidence collection, numbering, and description; photographed 604 Hillmer; photographed cul-de-sac; and scanner data.	20 min	20 min	
*Daniel Moody	Detective, Riverside County Sheriff's Department. Involved in scene evidence collection and photography.	20 min	20 min	
*D. Sandoval	Investigator; Riverside County Sheriff's Department. Involved in area canvass and investigation.	20 min	20 min	
*S. Anderson	Investigator; Riverside County Sheriff's Department. Involved in area canvass and investigation.	20 min	20 min	
*Custodians of Records	Custodians of records regarding Plaintiff's medical records and bills may be called is necessary to lay any foundation required.			

*Indicates that a witness will be called only if the need arises.

19

20

21

PLAINTIFF'S SECOND AMENDED WITNESS LIST

	.5 //12100		
1	ROB BONTA		
2	Attorney General of California DONNA M. DEAN		
3	Supervising Deputy Attorney General DAVID KLEHM		
4	Deputy Attorney General State Bar No. 165302		
5	TAMMY KIM Deputy Attorney General		
6	State Bar No. 262510 600 West Broadway, Suite 1800		
7	San Diego, CA 92101 P.O. Box 85266		
8	San Diego, CA 92186-5266 Telephone: (619) 738-9733		
9	Fax: (619) 645-2581 E-mail: David.Klehm@doj.ca.gov Attorneys for Defendant State of Californ	i.~	
10	acting by and through the California High Patrol (erroneously sued as "State of Cal	hwav	
11	and Michael Bell	ijornia)	
12	IN THE UNITED STAT	res distric	T COURT
13	FOR THE CENTRAL DIS		
14			ALDII OICIAIA
15			
16			
17	EDGAR SOLIS,	5:23-cv-0051	5-HDV-JPR
18	Plaintiff,	DEFENDAN WITNESS L	TTS' SIXTH AMENDED
19	v.	Date:	February 18, 2025
20	COUNTY OF RIVERSIDE; STATE	Time: Courtroom:	9:00 a.m. 10D
21 22	COUNTY OF RIVERSIDE; STATE OF CALIFORNIA; SALVADOR WALTERMIRE; and DOES 1-10, inclusive,	Judge:	The Honorable Hernan D. Vera
23	Defendants.	Trial Date:	February 18, 2025
24		Action Filed:	2/02/2023
25			
26			
27			
28			

1

2

3

4

5

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants State of California, acting by and through the California Highway Patrol, and Michael Bell hereby serve the following list of witnesses who may be called during trial. Defendants reserve the right to supplement or amend this list.

6	Witness's	Summary of	Direct	Cross	Dates of
	Name*, Title,	Testimony/Why	Exam	Exam	Testimony
7	Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	
8	Michael Bell,	Officer Bell is the	1.25		
9	Defendant, CHP Officer	defendant and will testify about his interactions with		;	
10		Plaintiff, training and			
11	*	experience with the CHP.			
12	Patrick Sobaszek,	Detective Sobaszek will testify about his	45 mins	45 mins	2/25/25
13	Detective, Hemet Police	interactions with and observations of			
14	Department	Plaintiff and incident, police tactics used,			
15		training and experience as a law			
16		enforcement officer, including in SWAT			
17		and on the Gang Task Force. Sobaszek is			
18		unique in that he was an eyewitness to			
19		various portions of the incident and heard and			
20		observed events, including from			
21		different angles or perspectives, that			
22		others may not have similarly observed.			
23	Salvador Waltermire,	Deputy Waltermire will testify about his	45 mins	30 mins	
24	Deputy, Riverside	interactions with and observations of			
25	County Sheriff's	Plaintiff and incident, including the third			
26	Department	volley of shots, police tactics used, and his			
27		training and experience as a law			
28		enforcement officer.			

1	Witness's Name*, Title, Affiliation (If	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	, "
3		Waltermire is unique in that he was an			
4		eyewitness to various			
5		portions of the incident and heard and			
6		observed events, including from			
7		different angles or			
		perspectives, that others may not have			
8	Arthur Paez,	similarly observed. Sergeant Paez will	30-45 min.	45 min.	
9	Sergeant,	testify about his	70- 4 5 mm.	43 mm.	2/25/25
10	Hemet Police Department	knowledge of Plaintiff,			
11	,	communications with the Gang Task Force		1	
12		concerning Plaintiff, and observations of			
13		Plaintiff and the			1
14		incident, including the third volley of shots,			
		police tactics used, as well as experience as			
15		a law enforcement officer. Paez is unique			
16		in that he was an			
17		eyewitness to various portions of the			
18		incident and heard and observed events,			1
19		including from different angles or			
20		perspectives, that			
1		others may not have similarly observed.			
21	M. Vargas, Lieutenant,	Stationed at San Gorgonio Pass Area	45 minutes	45 min	
22	CHP San	Office, Field			
23	Gorgonio Pass	Operations. Involved in post-shooting			
24		investigation and knowledge of			
25		Defendant Bell's tactical training.			
26	D. Harris,	Stationed at San	45 minutes	45 min	225/25
27	Sergeant, CHP San Gorgonio	Gorgonio Pass Area Office, Field Sergeant			' '
	Pass	and knowledge of Defendant Bell's			
28					

1	Witness's Name*, Title,	Summary of	Direct Exam	Cross Exam	Dates of Testimony
2	Affiliation (If Relevant)	Testimony/Why Testimony is Unique	(Hours)	(Hours)	restimony
3		tactical training.			
4	C. Hamilton, Lieutenant, CHP Border	CHP Critical Incident Investigation Team, Leader. Involved in	1 hour	1 hr	
5	Division CIIT	CHP critical incident investigation of the			
6		incident involving use of force on Plaintiff.			
7	J. Kawanaka, Sergeant, CHP	CHP Critical Incident Investigation Team,	45 minutes	45 min	2/21/25
8	Border Division CIIT	Lead Administrative Investigator. Involved			
9	Division CIT	in CHP critical incident investigation			
10		of the incident involving use of force			}
11	•	on Plaintiff.			
12					
13	Daniel Moody,	Riverside County Sheriff Department involved in the	45 minutes	45 min	
14	Detective	subsequent scene			
15		control or incident investigation and			
16		plaintiff's blood sample.			
17	J. Manjarrez, Detective	Riverside County Sheriff Department	30 minutes	30 min	
18		officials. Collected white bag of powdery		 	
19		substance from plaintiff's car			
20		suspected fentanyl and blood sample.]
21	A. Ditfurth, Deputy	Riverside County Sheriff Department official involved in	30 minutes.	30 min	
22		official involved in the incident			
23		investigation. Surveillance video			
24		from 642 Taschner Drive and plaintiff's			
25		firearm forensic analysis.			
26	Daniel Cline, Deputy	Riverside County	20 minutes	20 min	
27		Sheriff Department official involved in the incident			
28		investigation,			

1	Witness's	Summary of	Direct	Cross	Dates of
2	Name*, Title, Affiliation (If	Testimony is Unique	Exam (Hours)	Exam (Hours)	Testimony
3	Relevant)	obtained pictures,			
4		DNA swab, and Scanner data.			
	D. Sandoval,	Riverside County	20 min.	20 min.	
5 6	Investigator	official involved in the incident investigation,			
7		involved in area canvass and			
8	C. A. dansan	investigation.	20 min.	20	
9	S. Anderson, Investigator	Riverside County official involved in the incident	20 min.	20 min.	
10		investigation, involved in area			
11		canvass and investigation.			·
12	Jennifer Jernegan,	Riverside County Sheriff Department official involved in	20 minutes	20 min	
13	Lead Forensic Evidence	the incident investigation.			
14	Supervisor Yesika	Riverside County	40 minutes	40 min	26-6-
15	Alvarado, Forensic	Sheriff Department official involved in			425/25
16	Evidence Technician	the incident investigation.			
17		Captured pictures of scene, bullet holes and			۰
18		charted plaintiff's firearm.			
19					
20	A. Carey, Forensic Services	Riverside County Sheriff Department official involved in	20 minutes	20 min	
21	Bureau	the incident			
22	Technician	investigation. Obtained pictures of		}	
23		scene and plaintiff in hospital and first aid supplies and clothing.			
24	Venderfees,	Riverside County	20 minutes	20 min	
25	Forensic Services	Riverside County Sheriff Department official involved in			
26	Bureau Technician	the incident investigation.			
27		investigation. Obtained pictures of pursuit termination at 632 Taschner Drive			
28		1 032 Taschner Drive	<u> </u>		

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
		and point of rest of plaintiff's car and			
	Monique	carport damage. Riverside County	20 min	20 min	
	Torres, Forensic	Sheriff Department official involved in	20 11111	20 111111	
	Services Bureau	the incident	1		
	Technician	investigation. Went to scene to collect and chart evidence;			
		prepared a scaled 3D diagram.			
	Sienna Knoll, Forensic	Riverside County	20 min.	20 min.	
	Services Bureau	Sheriff Department official involved in the incident	œ.		
	Technician	investigation.	<u> </u>		
		Photographed and processed the Mustang.			
	Esteban Carranza,	Riverside County District Attorney's	30 minutes	30 min	
	Investigator	Investigator involved in the criminal			
		investigation of the incident.			
	J. Gonzalez, Lieutenant	Hemet Police Department Officer	30 minutes	30 min	
	Diculonant	responded to the area where Plaintiff fled			ľ
		and where shots were fired and involved in			
1		the subsequent scene control or incident	Į		
		investigation.	20	20	
	D. Maddox, Sergeant	Hemet Police Department Officer	30 minutes	30 min	
		Department Officer responded to the area where Plaintiff fled			
		and where shots were fired and involved in			
		the subsequent incident investigation.	ı.		
	G. Gomez, Detective	Hemet Police Department Officer	20 minutes	20 min	
		involved in the incident investigation.			
	Amy Lim	Riverside University Health System hospital laboratory	15 minutes	15 minutes	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	sample collection of blood and urine from			
	Plaintiff at hospital on			
1	date of incident.			
RN Joeallen*	Riverside University	15 min.	15 min.	
	Health System			
	concerning collection of blood and/or urine			
	samples from Plaintiff			
	at hospital on date of			
Valenzuela,	incident.	15 min.	15 min.	
Paola RN*	Riverside University Health System	15 11111.	13 111111.	
1 4014 14	concerning collection			
	of blood and/or urine			
	samples from Plaintiff at hospital on date of			
	incident.			
Otteson, Lisa	Riverside University	15 min.	15 min.	
Christine RN*	Health System			
	concerning collection of blood and/or urine	i		
	samples from Plaintiff	1		
	at hospital on date of			
McGuire,	incident. Riverside University	15 min.	15 min.	
Bailey RN*	Health System	13 11111.	13 11111.	
,	concerning collection			
	of blood and/or urine	Į		
	samples from Plaintiff at hospital on date of			
	incident.			1
Wilson, Stephen*	Riverside University	15 min.	15 min.	
Stepnen*	Health System			
	concerning collection of blood and/or urine	1		
	samples from Plaintiff			
	at hôspital on date of incident.			
Richard Doria,	Riverside University	15 min.	15 min.	_
Nurse*	Health System			
	hospital nurse			
	regarding sample collection of blood			
	and urine from			
	plaintiff at hospital on			
Rogers, Shana	date of incident.	15 min.	15 min.	
Lee NP*	Riverside University Health System	15 11111.	13 11111.	
	hospital nurse			

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
3		regarding sample			
$_{4}\parallel$		collection of blood and urine from			
		plaintiff at hospital on			
5	Wallaca	date of incident.	15	15 min	
5	Wallace, Bradley MD*	Riverside University Health System	15 min.	15 min.	1
7		hospital provider			
		regarding blood samples, and urine			
3		sample drug abuse			
9		screen of plaintiff at			
		hospital on date of incident.			
)	Gonzalez,	Riverside University	15 min.	15 min.	
	Reyna Teresa MD*	Health System hospital provider		*	
-	IVID	regarding blood			1
2		samples, and urine			
		sample drug abuse screen of plaintiff at			1
,		hospital on date of		Ì	
	Downing	incident.	20 mins	20 mins.	
5	Downing, Stephanie Rae,	Riverside University Health System	20 mins.	20 mms.	
5	MD*	hospital provider			
		regarding urine sample drug abuse			
7		screen of plaintiff at			
3		hospital on date of incident.			
	Albini, Paul	Riverside University	20 mins.	20 mins.	
)	Thomas, MD*	Health System			
	1	hospital provider regarding blood		Ì	
		samples of plaintiff at			
		hospital on date of			
	Custodian of	incident. Riverside University	20 mins.	20 mins.	
3	Records*	Health System			
		hospital witness			
4		concerning the urine sample and blood			
5		samples collected			
5		from plaintiff on date of incident.			}
	Kristen	Bio-Tox Laboratories	30 minutes	30 min	
,	Steward, M.S.,	Personnel involved in			
3	D-ABFT-FT	the testing and analysis of blood			1

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
3		obtained from Plaintiff.			
	Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in blood sample testing obtained from Plaintiff.	30 minutes	30 minutes	
3	A. Beckham*	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	15 minutes	15 minutes	
2	Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	2/26/25
	Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	2/25/25
)	Ronald	Board certified	45 minutes	30-40 min	
	Kvitne, M.D.	orthopedic surgeon medical expert will testify about his			
		review and analysis of			
2		plaintiff's medical records as they pertain to Plaintiff's injuries			
3		including further treatment.			
<u>ا</u> ا	Michael Bitton M.D.	Emergency Medicine	1 hour	45 min	2/25/25
5	Ritter, M.D.	expert will testify about his review and analysis of plaintiff's			2/25/25
5		Toxicology drug results positive for			
7		methamphetamine and PCP and other medical records			

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
		pertaining to Plaintiff's injuries.			
	Leslie Martinez	Resident of the property where the incident occurred who	20 minutes	20 min	
		heard yelling and gunshots.			
	Marlene Sue Biggs	Resident who observed 2-3 officers chase a male adult and	20 minutes	20 min	
	Jose Jesus Rodriguez	Resident who heard gunshots and heard suspect run through	20 minutes	20 min	
		property perimeter and the officer			
3		chasing after him. Heard shouting and the words "He's got a gun" followed by			
	Ana Rodriguez	Resident who heard gunshots and heard	20 minutes	20 min	
		suspect run through property perimeter and the officer chasing after him			
		chasing after him. Heard shouting and the words "He's got a gun" followed by			
	Liliana	Resident who heard	20 minutes	20 min	
	Rodriguez	gunshots and heard suspect run through property perimeter			
		property perimeter and the officer chasing after him.			
		Heard shouting and the words "He's got a gun" followed by			
		gun" followed by numerous gunshots Resident who			
	Pearo Rodriguez	provided surveillance video from camera	20 minutes	20 min	
		mounted to front of residence			
	Florina Maria Mandujano	Resident who provided surveillance video from camera	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	mounted to front of residence			
Thomas Jordan	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Nidia Santana	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla	Resident who heard a crashing sound and observed the suspect	30 minutes	30 min	
	jump over an east wall. Then heard one of the officers yell, "He's got a gun"			
	"He's got a gun" followed by numerous gunshots and			
	shouting, Mr. Contla			
	recognized suspect, having seen him in the area before the			
Kathy Lynn	incident. Resident of the area	20 minutes	20 min	
Cassel	where the suspect collided with the Kia			
	Sorrento causing damage to the Kia,			
	support post for the parking stall awning and block wall			
Jaden Schlig	Resident and	20 min	20 min	
	eyewitness to portions of incident from 633 Hillmer Drive.		,	
Trinidad Rueta	Resident and eyewitness to portions	20 min	20 min	2/25/25
	of incident from 603 Hillmer Drive.			

SECOND AMENDED JOINT EXHIBIT LIST

Document 137

ID #:1792

Filed 02/28/25 Page 22 of 42 Page

Case, 5:23-cv-00515-HDV-JPR

1 TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF 2 **RECORD:** 3 Plaintiff Edgar Solis and Defendants State of California and Michael Bell hereby submit the following objections to exhibits which they may utilize during 4 trial. The parties reserve the right to supplement and/or amend these objections to 5 exhibits. 6 7 8 Respectfully Submitted, DATED: February 18, 2025 LAW OFFICES OF DALE K. GALIPO 9 LAW OFFICES OF GRECH & PACKER 10 Marcel F. Sincich By: 11 Dale K. Galipo Marcel F. Sincich 12 Trent C. Packer Attorney for Plaintiff Edgar Solis 13 14 DATED: February 18, 2025 **ROB BONTA** 15 Attorney General of California NORMÁN MORRISON 16 Supervising Deputy Attorney General 17 18 Tammy Kim DAVID KLEHM, Deputy Attorney General TAMMY KIM, Deputy Attorney General Attorneys for Defendants State of California (by 19 20 and through the California Highway Patrol) and Michael Bell 21 22 23 24 25 26 27

28

OBJECTIONS TO EXHIBIT RE. JOINT EXHIBIT LIST

_			TIVE EXHIBITE ETO		
2	Ex.	Description	Objection ¹	Response to Objection	Date Admitted
3			Photographs	Objection	Admitted
4	1.	Sgt. Paez Deposition	Objection. This is	FRE 801, Not	1-4219
5		Exhibit 1	not an accurate	hearsay;	cell e/24
6			depiction of the scene at the time of	impeachment of Defendant;	
7			the incident and is a	relevant to	
8			demonstrative exhibit not	position of parties at the time of the	
9			evidence.	shots fired; based	
			FRE 801 hearsay.	on person	
10		*	FRE 401 irrelevant info. unknown;	knowledge of	
11			FRE 403 unduly	deponent.	
12			prejudicial,		
13			cumulative; FRE		
14			602 & 611 speculation, lacks		
15			foundation.		
16	2.	Sgt. Paez Deposition	Objection. This is	FRE 801, Not	2/19/25 all
17		Exhibit 2	not an accurate depiction of the	hearsay; impeachment of	ael
			scene at the time of	Defendant;	
18			the incident and is a	relevant to	
19			demonstrative exhibit not	position of parties at the time of the	
20			evidence.	shots fired; based	
21			FRE 801 hearsay.	on person	
22			FRE 401 irrelevant info. unknown;	knowledge of	
23			FRE 403 unduly	deponent.	
24			prejudicial,		
4			cumulative; FRE		

¹ Plaintiff and Defendants reserve the right to object portion of documents listed in the following joint exhibit list that are objectionable pursuant to FRE 401, 403, 404, and 801.

25

26

27

28

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		602 & 611		
		speculation, lacks		
		foundation.		
3.	Det. Sobaszek	Objection. This is	FRE 801, Not	
	Deposition Exhibit 3	not an accurate	hearsay; relevant	
		depiction of the scene at the time of	to position of	
		the incident and is a	parties at the time of the shots fired;	
		demonstrative	based on person	
		exhibit not	knowledge of	
		evidence.	deponent.	
į	,	FRE 801 hearsay.	•	
		FRE 401 irrelevant		
		info. unknown;		
		FRE 403 unduly		
		prejudicial,		
		cumulative; FRE 602 & 611		
ĺ		speculation, lacks		
		foundation.		
4.	Det. Sobaszek	Objection. This is	FRE 801, Not	
	Deposition Exhibit 4	not an accurate	hearsay; relevant	
		depiction of the	to position of	
į		scene at the time of	parties at the time	
		the incident and is a	of the shots fired;	
		demonstrative exhibit not	based on person knowledge of	
		evidence.	deponent.	
		FRE 801 hearsay.	deponent.	
		FRE 401 irrelevant		
		info. unknown;		
		FRE 403 unduly		
		prejudicial,		
		cumulative; FRE		
		602 & 611		
		speculation, lacks foundation.		
5.	Photographs of Off.	Objection to the	Accurately depicts	5-3
	Bell	first two	Defendant Officer	2/18/25

Case ₁ 5:23-cv-00515-HDV-JPR	Document 137	Filed 02/28/25	Page 26 of 42	Page
, 1	ID #:1796		-	

Ex.	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 727, 729, 731)	paragraphs, AGO 727, AGO 729. FRE 403, unduly prejudicial, cumulative.	Bell and what he was wearing at the time of the incident.	
6.	Photograph of Off. Bell Gun (AGO 687)			2/25/25
7.	Maps Marked by Officer Bell (AGO 335-336)	Objection. These markings on maps are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant	FRE 801(d)(2)(a), Party opponent admission. Relevant to Defendant's testimony and claimed	7-1 2/19/1
		info. unknown; FRE 403 unduly prejudicial, cumulative; FRE	description of the incident.	
		602 & 611 speculation, lacks foundation.		
8.	Det. Sobaszek Deposition Exhibit 8	Toundation.		
9.	Photographs of Sgt. Paez (AGO 630, 750)			
10.	Photographs of Det. Sobaszek			
11.	(AGO 643, 645) Photographs of Dep. Waltermire			
12.	(AGO 693, 698) Photographs of Dep.			
13.	Waltermire Gun (AGO 684)			
13.	Photographs of Stealth Explorer (AGO 530)			2118125

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
14.	Photographs of			14-1 2/18
	Green Mustang			
	(AGO 547-48, 550,			
	552, 595)			
15.	Photographs of 633			
	Hillmer			
	(AGO 658, 666)			
16.	Scene and Evidence		<i>'</i> .	16-21 ~
	Photographs	nule: 16-20	1	2/18/25
	(AGO 799, 800, 802,	16-22	a santond	14-202
	805, 813, 816-17,	16-20 16-28 16-28 16-49 16-49 16-52	Re Almure	2/18/25
	820, 852-53, 855,	16 43 x on	421/21	
	857, 869, 874-75,	14-62 62		14-22 V
	877, 881, 887-89,	14.75		2/19/25
	891-92, 896, 901,			14-28V
	950, 953, 955-57,			2/19/25
	960, 963, 965, 967-			14-3CV
	68, 970, 974-75, 978-			2/19/25
	79, 981, 986-87, 989,			
	991, 993-96, 1001,			16-457
	1003-05, 1012, 1015,			16-424
	1020, 1022, 1027-30,			14-484
	1032, 1034-36, 1038,			14-49
	1042-43, 1047-49,			16-50
	1067, 1069, 1071, 1082-88, 1092-96,			
	1098, 1100-01, 1103-			16-27 74
	04, 1106, 1110,			14-200
	1113, 1117-24, 1126,			1623 V
	1129-33, 1135, 1137,			10-24-6
	1139, 1142-44, 1146,			440
	1148, 1161, 1163,			V16-62 2
	1165-66, 1173-82,			116-68 2
	1185-88, 1190-91,	}		1/16-52 2/
	1195, 1197-99, 1203-			110-10 2/2
	05, 1207-19)			16-52 2/ V16-10 2/2 V16-31 2/2 18-3 2/24
17.	(Reserved)			, ,
18.	Photos of Plaintiff in			18-3 224
	Hospital			

Case _{II} 5:23-cv-00515-HDV-JPR	Document 137	Filed 02/28/25	Page 28 of 42	Page
,	ID #:1798			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 765-66, 1221- 33)			-t.f.
19.	Photographs of Plaintiff's Injuries (P 144, 416-20, 456,		V	19-1 2/26/2 19-11 2/2 19-14] 19-15 } 2/24
	478-79, 512, 2456- 60, 5462, 5501-03, 5541-43)			19-15 } 2/24 19-75
20.	Photographs of Edgar Solis	FRE 403 unduly prejudicial,	Relevant to damages, not	w-6 324
5.	(P 4064-4084) ₩20-18 NOT ADMI HED	cumulative; FRE 602 & 611	outweighed by prejudice;	70-8 2/4
		speculation, lacks foundation.	foundation to be given by Plaintiff.	
21.	(Reserved)			
22. 23.	(Reserved) GLA Investigation	Objection to term	Relevant as	23-1
	Scene Photographs (produced in Expert Disclosures)	Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611	accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; no hearsay included; foundation given by Plaintiff's investigator who conducted the scene assessment.	23-8 23-13 23-13 23-15 23-16 23-29 23-34 23-35 23-30 23-
		speculation, lacks		
		foundation; FRE 701-704.		
2.5		Videos		
24.	603 Hillmer Front Yard Video	Defendants reserve their right to object	Plaintiff reserves the right to	
			the right to Case No.: 5:23-cv-0051	5-HDV-JPR

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(relevant portions of	to this exhibit	respond. Plaintiff	
	AGO 504)	because plaintiff	only plans to	
		has not provided the "relevant	admit relevant portions of videos	
		portions" of this	as necessary based	
		exhibit.	on testimony given.	
25.	Screenshots from 603	Defendants reserve	Plaintiff reserves	25-1
	Hillmer Video	their right to object to this exhibit	the right to respond. Plaintiff	10010
		because plaintiff has not produced or	only plans to admit screenshots	
	1	identified the	as necessary based	
		screenshots that comprise this	on testimony given.	
		exhibit.		
26.	614 Hillmer Front Yard Video 1	Defendants reserve their right to object	Plaintiff reserves the right to	ael
	(relevant portions of	to this exhibit	respond. Plaintiff	2.2
	AGO 514)	because plaintiff has not provided	only plans to admit relevant	2/2/6/2
		the "relevant	portions of videos	
		portions" of this	as necessary based	
		exhibit.	on testimony given.	
27.	Screenshots from 614	Defendants reserve	Plaintiff reserves	27-3
	Hillmer Front Yard	their right to object	the right to	41712
	Video 1	to this exhibit because plaintiff	respond. Plaintiff only plans to	
		has not produced or	admit screenshots	
		identified the	as necessary based	
		screenshots that	on testimony	
		comprise this exhibit.	given.	
28.	614 Hillmer Back	Defendants reserve	Plaintiff reserves	
	Yard Video 1	their right to object	the right to	
	(relevant portions of AGO 524)	to this exhibit because plaintiff	respond. Plaintiff only plans to	
1	AUU 324)	has not provided	admit relevant	

Ex.	Description	Objection ¹	Response to Objection	Date Admitted
		the "relevant portions" of this exhibit.	portions of videos as necessary based on testimony given.	
29.	Screenshots from 614 Hillmer Back Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	29-1
30.	Deputy Waltermire BWC Video (relevant portions of	Defendants reserve their right to object to this exhibit	Plaintiff reserves the right to respond. Plaintiff	2/20/25
	AGO 506)	because plaintiff has not provided	only plans to admit relevant	
		the "relevant portions" of this exhibit.	portions of videos as necessary based on testimony given.	
31.	Deputy Waltermire Video 00:00-00:15		8	
32.	Deputy Waltermire Video 01:05-01:40			
33.	Deputy Waltermire Video 01:40-12:58			
34.	Screenshots from Deputy Waltermire BWC Video	Defendants reserve their right to object to this exhibit because plaintiff	Plaintiff reserves the right to respond. Plaintiff only plans to	
		has not produced or identified the screenshots that comprise this exhibit.	admit screenshots as necessary based on testimony given.	
35.	Sergeant Paez BWC Video (relevant	Defendants reserve their right to object	Plaintiff reserves the right to	P930143

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	portions of AGO	to this exhibit	respond. Plaintiff	
	507)	because plaintiff	only plans to	
		has not provided	admit relevant	
		the "relevant	portions of videos	
		portions" of this exhibit.	as necessary based on testimony	
		CAMOIL.	given.	
36.	Sergeant Paez Video			
	01:20-02:00			
37.	Sergeant Paez Video			
	02:00-06:13	D C 1	D1 : .: .: .: .: .:	20 -11
38.	Screenshots from	Defendants reserve	Plaintiff reserves the right to	2/19/25
	Sergeant Paez BWC Video	their right to object to this exhibit	respond. Plaintiff	28-5
	Video	because plaintiff	only plans to	2/20/20
		has not produced or	admit screenshots	
		identified the	as necessary based	
		screenshots that	on testimony	
		comprise this	given.	
39.	614 Hillmer Front	exhibit. Defendants reserve	Plaintiff reserves	
39.	Yard Video 2	their right to object	the right to	
	(relevant portions of	to this exhibit	respond. Plaintiff	!
	AGO 518)	because plaintiff	only plans to	
		has not provided	admit relevant	
		the "relevant	portions of videos	
		portions" of this	as necessary based	
		exhibit.	on testimony given.	
40.	Screenshots from 614	Defendants reserve	Plaintiff reserves	
	Hillmer Front Yard	their right to object	the right to	
	Video 2	to this exhibit	respond. Plaintiff	
		because plaintiff	only plans to	
		has not produced or	admit screenshots	
		identified the	as necessary based	
		screenshots that comprise this	on testimony given.	
		exhibit.	Siven.	
41.	614 Hillmer Front	Defendants reserve	Plaintiff reserves	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	Yard Video 3	their right to object	the right to	
	(relevant portions of	to this exhibit	respond. Plaintiff	
	AGO 512)	because plaintiff	only plans to	
		has not provided the "relevant	admit relevant portions of videos	
		portions" of this	as necessary based	
		exhibit.	on testimony	
			given.	
42.	Screenshots from 614	Defendants reserve	Plaintiff reserves	
	Hillmer Front Yard	their right to object	the right to	
	Video 3	to this exhibit	respond. Plaintiff only plans to	
	5	because plaintiff has not produced or	admit screenshots	٠
		identified the	as necessary based	
		screenshots that	on testimony	
		comprise this	given.	
42	C14 II'II D 1	exhibit.	D1 : .: CC	
43.	614 Hillmer Back Yard Video 2	Defendants reserve their right to object	Plaintiff reserves the right to	
	(relevant portions of	to this exhibit	respond. Plaintiff	
	AGO 519)	because plaintiff	only plans to	
	·	has not provided	admit relevant	
		the "relevant	portions of videos	
		portions" of this exhibit.	as necessary based	
		exhibit.	on testimony given.	
44.	Screenshots from 614	Defendants reserve	Plaintiff reserves	
	Hillmer Back Yard	their right to object	the right to	
	Video 2	to this exhibit	respond. Plaintiff	
		because plaintiff	only plans to	
		has not produced or identified the	admit screenshots	
		screenshots that	as necessary based on testimony	
		comprise this	given.	
		exhibit.		
45.	614 Hillmer Back	Defendants reserve	Plaintiff reserves	
	Yard Video 3	their right to object	the right to	
	(relevant portions of AGO 521)	to this exhibit because plaintiff	respond. Plaintiff only plans to	
L	AGO 321)	vecause plantini	only plans to	<u> </u>

Case _{II} 5:23-cv-00515-HDV-JPR	Document 137	Filed 02/28/25	Page 33 of 42	Page
,	ID #:1803		-	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		has not provided	admit relevant	
		the "relevant	portions of videos	
		portions" of this	as necessary based	
		exhibit.	on testimony	
			given.	
46.	Screenshots from 614	Defendants reserve	Plaintiff reserves	
	Hillmer Back Yard	their right to object	the right to	
	Video 3	to this exhibit	respond. Plaintiff	
		because plaintiff	only plans to	
		has not produced or	admit screenshots	
		identified the	as necessary based	
		screenshots that	on testimony	
		comprise this	given.	
		exhibit.		
	P	laintiff's Medical Re	cords	
47.	RUHS Medical		47-33 1 Dentificationly 2/24/25	(
	Records		2/2/125	
	(P 2,7-16, 18-35, 43-			
	44, 67-81, 98-109,			
	117-26, 135-37, 144,			
	334-77, 408-11, 416-			
	20, 438-41, 451-54,			
	456, 460-63, 467-70,			
	478-79, 483-86, 489-			
	92, 496-99, 512, 517-			
	19, 523, 529-32, 551-			
	52. 609-11, 623, 625-			
	62, 725, 728, 822,			
	936-37, 939, 2437,			
	2456-60, 2463, 2465,			
	2502, 2507, 2510,			
40	2593, 2596, 2597)			
48.	Riverside Medical			
	Records			
	(P 2622, 2705, 2714-			
40	(Pageword)			
49.	(Reserved)			·····
50.	High Desert Medical			
	Records			
		12	Case No.: 5:23-cv-0051:	

Case _{II} 5:23-cv-00515-HDV-JPR	Document 137	Filed 02/28/25	Page 34 of 42	Page
	ID #:1804		_	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(P 2884)			
51.	CDCR Medical			
	Records			
	(P 4531, 4562, 4569,			
	5162-5164, 5210-12,			
	5215-16, 5225-26,			
	5228-5229, 5240-41,			
	5265, 5406-5409,			
	5431, 5444, 5450,			
	5362, 5501-03, 5541-			
	43, 6567, 6591, 8896-8899)			e
52.	AMR Records	FRE 403 FRE 403	Plaintiff produced	1 . /
32.	(selected from P	unduly prejudicial.	these records	2/24/25
	8890-8903)	Plaintiff just	shortly after they	'all
	0070 0703)	produced these on	were received.	
		September 20.	Defendants were	
		Defendants have	on notice that	
		not had an	there was	
		opportunity to	emergency	
		depose the third	medical case,	
		parties referenced	there is no	
		in these records.	prejudice suffered,	!
			yet highly relevant	
			to damages.	
53.	High Desert Imaging			0
	(P 4085)	CH Charles	CII (ANN alzulas)	
54.	RUHS Imaging	104-10+100/16/16/10 100mh fully /24/25	54-6 ADM 2/24/25V 54-12 ADM 2/24/25V	2/24/25
			31.0.	54-2 14 2/2
	7	t / Refresh Recollect	tion / Demonstrative	*
55.	RCSD Report by	Defendants reserve	For impeachment	
	Deputy Cline re 614	their right to object	or to refresh	
	N. Hillmer Dr.	to this exhibit	recollection as	
	(relevant portions of	because plaintiff	indicated; relevant	
	COR 1008-1031)	has not provided	portions to be used	
		the "relevant	as necessary based	
		portions" of this exhibit.	on testimony given.	
56.	Officer Bell CIIT	Objection.	For impeachment	
20.	Officer Bell Cli I	Objection.	Tor impeaciment	<u> </u>

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
20.00	Statement	Confidential	or to refresh	
	(relevant portions of	compelled	recollection as	
	AGO 497)	statement of a Law	indicated; does not	
		Enforcement	qualify for a	
		Officer.	confidential	
			designation.	
57.	Transcript of Officer	Objection.	For impeachment	
	Bell CIIT Statement	Confidential	or to refresh	
	(relevant portions	compelled	recollection as	
	AGO 68-161)	statement of a Law	indicated; does not	
	1 Dentifel) my	Enforcement	qualify for a	
	2/19/25	Officer.	confidential	
			designation.	
58.	Officer Bell CHP	Objection.	For impeachment	
	Statement	Confidential	or to refresh	
	(relevant portions of	compelled	recollection as	
	AGO 500)	statement of a Law	indicated; does not	
		Enforcement	qualify for a	
		Officer.	confidential	
-	T	01'	designation.	
59.	Transcript of Officer	Objection.	For impeachment	
	Bell CHP Statement	Confidential	or to refresh	
	(relevant portions	compelled	recollection as	
	AGO 162-192)	statement of a Law	indicated; does not	
		Enforcement Officer.	qualify for a confidential	
İ	2.64/20	officer. 59-22 Dent ful)	designation.	
60		Objection. Hearsay.	For impeachment	
60.	Deputy Waltermire Statement	Plaintiff has not	or to refresh	
°	(relevant portions of	shown the witness	recollection as	
	AGO 499)	is unavailable to	indicated.	
	AGO 477)	testify.	marcatea.	
		FRE 801 hearsay.		
61.	Transcript of Deputy	Objection. Hearsay.	For impeachment	
	Waltermire	Plaintiff has not	or to refresh	
	Statement	shown the witness	recollection as	
	(relevant portions of	is unavailable to	indicated.	
	AGO 193-248)	testify.		
	,	FRE 801 hearsay.		

Ex.	Description	Objection ¹	Response to Objection	Date Admitted
62.	Officer Sobaszek	Objection. Hearsay.	For impeachment	
	Statement	Plaintiff has not	or to refresh	
	(relevant portion	shown the witness	recollection as	
	AGO 501)	is unavailable to	indicated.	
		testify.		
	- CO 00	FRE 801 hearsay.		
63.	Transcript of Officer	Objection. Hearsay.	For impeachment	
	Sobaszek Statement	Plaintiff has not shown the witness	or to refresh recollection as	
	(relevant portions of AGO 294-300)	is unavailable to	indicated.	
	AGO 294-300)	testify.	indicated.	
		FRE 801 hearsay.		
64.	Sgt. Paez Statement	Objection. Hearsay.	For impeachment	
	(relevant portions of	Plaintiff has not	or to refresh	
	AGO 502)	shown the witness	recollection as	
	,	is unavailable to	indicated.	
		testify.		
		FRE 801 hearsay.		
65.	Transcript of Sgt.	Objection. Hearsay.	For impeachment	
	Paez Statement	Plaintiff has not	or to refresh	
	(relevant portions of	shown the witness	recollection as	
	AGO 301-334)	is unavailable to	indicated.	
		testify.		
	D	FRE 801 hearsay.	Tietad as	
66.	Demonstrative	Objection This is a demonstrative	Listed as demonstrative.	,
	Yellow Dummy Gun	exhibit not	Not hearsay. Not	
		evidence.	testimonial.	
		FRE 801 hearsay.	testimomai.	
		FRE 401 irrelevant		
		info. unknown;		
		FRE 403 unduly prejudicial,		
		cumulative; FRE		
		602 & 611		
		speculation, lacks		
		foundation.		
67.	Demonstrative Fence	Objection. This is	Listed as	
		inflammatory and	demonstrative.	

Ex.	Description	Objection ¹	Response to	Date
#	Description		Objection	Admitted
·		inaccurate.	Not hearsay. Not	
		Objection This is a	testimonial.	
}		demonstrative		
		exhibit not		
		evidence.		
		FRE 801 hearsay. FRE 401 irrelevant		
		info. unknown;		
		FRE 403 unduly		
		prejudicial,		
		cumulative; FRE		
		602 & 611		
		speculation, lacks		
		foundation.		
68.	Demonstrative Scene	Objection to term	Relevant as	
	Assessment	Scene Assessment	accurate	
	Measurements	as these were not	description of	
	(produced in Expert	taken at the scene	scene not provided	
	Disclosures)	on the date of the	by investigators	
		incident. These are demonstrative	reports; relevant	
		exhibits not	and not hearsay as impeachment of	
		evidence.	Defendant Bell's	
		evidence.	testimony;	
		FRE 801 hearsay.	foundation given	
		FRE 401 irrelevant	by Plaintiff's	
		info. unknown;	investigator who	
		FRE 403 unduly	conducted the	
		prejudicial,	scene assessment.	
		cumulative; FRE		
		602 & 611		
		speculation, lacks		
		foundation; FRE		
69.	Demonstrative Maps	701-704. Untimely	Defendants are not	
03.	Demonstrative waps	disclosure. These	unduly prejudiced	
		are demonstratives,	by Google maps	
		which were	images accurately	
		untimely disclosed,	depicting the	

Case _I 5:23-cv-00515-HDV-JPR	Document 137	Filed 02/28/25	Page 38 of 42	Page
· .	ID #:1808			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		and not evidence. L.R. 16-3; FRCP 26; FRE 403 cumulative; FRE 611 speculation, lacks foundation.	scene as demonstrative evidence to orient the jury to the location of the incident.	

DEFENDANTS' ADDITIONAL EXHIBITS

_					D 1:
2	No.	Description	Objection	Response	Ruling
3	100.	Composite Video 1	FRE 401, 403, 801; untimely, FRCP	Timely disclosed in	
4		of Multiple individual homeowner videos	26.	Parris Ward's expert report; no	
5		and BWC videos		prejudice to	
- []		and BWC videos		Plaintiff; relevant;	
6				helpful to jury.	
7				This exhibit is	
8				simply a composite	
				of the videos listed	
9				by Plaintiff and Defendants as	
10		a .	e e	separate exhibits.	
11	101.	Composite Video 2	FRE 401, 403, 801;	Timely disclosed in	2/25/25
12		of Multiple individual	untimely, FRCP 26.	Parris Ward's	1-3/-3
		homeowner videos	20.	expert report; no	
13		and BWC videos		prejudice to	
14				Plaintiff; relevant;	
15				helpful to jury. This exhibit is	
				simply a composite	
16				of the videos listed	
17		4		by Plaintiff and	
18				Defendants as	
19			P MILs 1-4.	separate exhibits.	
	102.	Critical Incident	FRE 801 hearsay.	Official Record.	
20		Investigation - C22- 601-001 [AGO 1-7]	FRE 401 irrelevant	FRE 803(8)(A)(i) and (iii).	
21		001-001 [AGO 1-7]	info. unknown;	Business Record.	
22			FRE 403 unduly	FRE 803(6)(B).	
23			prejudicial, cumulative; FRE	Findings which	
			404 impermissible	dispute Plaintiff's expert's opinion	
24			character evidence;	that Officer Bell	
25			FRE 602 & 611	did not comply	
26			speculation, lacks	with CHP's	
27			foundation; FRE 701 & 702	Policies.	
			improper opinion.	Phillips v. Bratton, 2008 WL	
28			1 1 1	2000 WL	

No.	<u>Description</u>	Objection	Response	Rulin
			11409876, at *10	
			(Case No. CV 07-	
			873 CAS (VBKX),	
			C.D. Cal. Jan. 28,	
			2008). Corroborates	
			defendant Officer	
			Bell's observations	
			that plaintiff was	
			actively resisting	
			and evading arrest	
			because plaintiff	
	5		was aware that he	j
			would be sent back	
			to prison due to	
			being a felon in	
			possession of a firearm and	
			narcotics.	
			narcotics.	
103.	Summary of Incident	P MILs 1-4.	Official Record.	
	[AGO 10-13]	FRE 801 hearsay.	FRE 803(8)(A)(i)	
		FRE 401 irrelevant	and (iii).	
		info. unknown;	Business Record.	
		FRE 403 unduly	FRE 803(6)(B).	
		prejudicial, cumulative; FRE	Findings which	
		404 impermissible	dispute Plaintiff's	
		character evidence;	expert's opinion that Officer Bell	
		FRE 602 & 611	did not comply	
		speculation, lacks	with CHP's	
		foundation; FRE	Policies.	
		701 & 702	Phillips v. Bratton,	
		improper opinion.	2008 WL	
			11409876, at *10	<u> </u>
			(Case No. CV 07-	
			873 CAS (VBKX),	
			C.D. Cal. Jan. 28,	
			2008). Corroborates	
	1	10 (_UDVI
	SECON	19 ND AMENDED JOINT EXH	Case No.: 5:23-cv-00515- IBIT LIST	-HDV-

1	NT.	D	01: 4:	D	D. II
1	No.	<u>Description</u>	<u>Objection</u>	Response	Ruling
2 3 4 5 6				defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff	
7 8 9				was aware that he would be sent back to prison due to being a felon in possession of a	
10		5		firearm and narcotics.	g.
11	104	0 0	P MILs 1-4.	0000	
12	104.	Scene Description [AGO 14]	FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	
13 14			FRE 401 irrelevant info. unknown; FRE 403 unduly	and (iii). Business Record. FRE 803(6)(B).	
15	3		prejudicial, cumulative; FRE	Findings which	
16			404 impermissible	dispute Plaintiff's expert's opinion	
17			character evidence; FRE 602 & 611	that Officer Bell did not comply	
18 19			speculation, lacks foundation; FRE	with CHP's Policies.	
20			701 & 702 improper opinion.	Phillips v. Bratton, 2008 WL	
21				11409876, at *10	
22	i			(Case No. CV 07-873 CAS (VBKX),	
23		ı		C.D. Cal. Jan. 28,	
24				2008).	
25	105.	Plaintiff's October			2/24/25
26		23, 2024, Deposition Exhibit 6-1.			2/24/25
27	105		PMIL 1.	0.00 1.15	
28	106.	Crime Scene Evidence Collection	FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	
		SECON	20 C ND AMENDED JOINT EXH	Case No.: 5:23-cv-00515-	-HDV-JPR

& Storage [AGO 43] Injury Descriptions [AGO 44]	FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay. FRE 401 irrelevant	and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay.	FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay.	Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay.	Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	speculation, lacks foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay.	that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	foundation; FRE 701 & 702 improper opinion. P MIL 1. FRE 801 hearsay.	actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	P MIL 1. FRE 801 hearsay.	because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	-
	P MIL 1. FRE 801 hearsay.	was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	would be sent back to prison due to being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	being a felon in possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	possession of a firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	firearm and narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	narcotics. Official Record. FRE 803(8)(A)(i)	
	FRE 801 hearsay.	FRE 803(8)(A)(i)	
[AGO 44]	· · · · · · · · · · · · · · · · · · ·		
		1 (***)	
	info. unknown;	and (iii). Business Record.	
	FRE 403 unduly	FRE 803(6)(B).	
	prejudicial,		
	cumulative; FRE 602 & 611		
	speculation, lacks		
	foundation; FRE		
Plaintiff's October		Relevant and	
23, 2024, Deposition	and incorporates by	admissible as	
Exhibit 2	reference all	statement by party	
	merem. FRE 403.		
		FRCP 33(c); FRE	
		801(d).	
Maps [AGO 335-	FRE 801 hearsay.	N S G IV SHOUSHOUSEDASSE SHE SHESH ESHLUSING SURRENUS	
330]		and (iii).	
	1		
	Exhibit 2	foundation; FRE 701 & 702 improper opinion. Plaintiff's October 23, 2024, Deposition Exhibit 2 Maps [AGO 335- FRE 801 hearsay.	foundation; FRE 701 & 702 improper opinion. Plaintiff's October 23, 2024, Deposition Exhibit 2 Plaintiff restates and incorporates by reference all objections made therein. FRE 403. Maps [AGO 335- 336] FRE 801 hearsay. FRE 803(8)(A)(i)